

# Zoë Dolan

www.zoedolan.com  
zdolan@gmail.com

Attorney At Law  
Admitted NY & CA  
(347) 301-5180

154 Grand Street  
New York, NY 10013

August 14, 2015

Hon. William F. Kuntz II  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: *United States v. Bumagin*, 11 Cr. 800

Dear Judge Kuntz:

The defense objects to the government's August 13, 2015 letter "Respectfully Requesting that Deadline for Defendant to Provide Notice Under Fed. R. Crim. P. 12.2 Be Advanced to August 20, 2015," docket entry 135, in its entirety. I reserve the right to address arguments raised by the government in accordance with the briefing schedule agreed to by the parties and ordered by the court upon my return to work the week after next following some necessary personal time. The government can claim no prejudice since, as the August 13 letter observes, the issues have been pending for years.

The Court's consideration of this letter is appreciated.

Sincerely,

s/  
Zoë Dolan

Cc: All counsel via ECF